



SOCIETY FOR AMERICAN ARCHAEOLOGY

March 15, 2018

Mr. Jerome Perez
BLM California State Director
2800 Cottage Way
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Sacramento, CA 95825
BLM_CA_DRECP@BLM.gov

RE: Comments from the Society for American Archaeology (SAA) Task Force on the Public Scoping for Reconsideration of the Bureau of Land Management (BLM) Desert Renewable Energy Conservation Plan (DRECP)

Dear Mr. Perez,

The SAA Task Force on the DRECP appreciates the opportunity to consult on the development of cultural resources strategies and documentation. The comments included in this letter relate to public scoping meetings the BLM held from February 26 to March 7, 2018.

As you know, SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

The following comments are intended to help the BLM in its review of the DRECP and its associated National Environmental Policy Act (NEPA) documents required by the President's Executive Order 13783. This Executive Order requires all federal agencies to review all actions that could potentially burden energy development. Specifically, we understand that the BLM is required to determine if the DRECP and associated NEPA documents potentially burdens domestic renewable energy production in California.

Please consider the following comments:

- The DRECP and associated NEPA documents were developed to streamline renewable energy development in southwestern California. Part of this streamlining process

classified areas that would be more or less suitable for development, making clear natural and cultural resource constraints that already exist. The DRECP also identifies areas that qualify for streamlined documentation, further reducing costs and regulatory roadblocks to renewable energy development. Therefore, the DRECP already fulfills the objective of Presidential Executive Order 13783 because it reduces administrative burdens associated with environmental management.

- The DRECP, though not complete, has demonstrated its effectiveness in streamlining the NEPA and Section 106 processes for energy development on the Ten West transmission line project that spans California and Arizona. The Ten West project would provide a reliable 500 kV transmission connection between substations in Tonopah, Arizona and Riverside County, California, spanning 114 miles. The BLM is the lead federal agency for purposes of compliance with the National Environmental Protection Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA), and is preparing an Environmental Impact Statement (EIS). The California Public Utilities Commission (CPUC) is the lead agency for compliance with the California Environmental Quality Act (CEQA) on California's lands. Multiple other agencies are consulting on the document, including California's State Historic Preservation Office (SHPO). For the Ten West project, the DRECP's predictable processes and well-documented resource constraints enabled effective planning and preliminary identification of the most environmentally favorable alternative transmission line route. The DRECP also proved effective in streamlining inter-agency coordination, including with California's Public Utilities Commission. For these reasons, the DRECP has emerged as a crucial component in the growth and connectivity of renewable energy sources.

The SAA appreciates the opportunity to continue as a consulting party on the DRECP and associated documents. As a consulting stakeholder, we believe the DRECP to be an effective planning tool that upholds the SAA's ethics and values pertaining to historic preservation, while allowing for responsible energy development.

Sincerely,

A handwritten signature in black ink that reads "Susan M. Chandler". The signature is written in a cursive, flowing style.

Susan Chandler
President

CC: SAA DRECP Task Force members: Micah Hale, Mark Allen, Chris Doolittle, Ryan Byerly, Rod McLean, Vanessa Mirro, Glenn Russell